

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

FLASH-CONTROL, LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Civil Action No. 1:19-cv-1107-ADA

JURY TRIAL DEMANDED

**JOINT CLAIM CONSTRUCTION STATEMENT**

Plaintiff Flash-Control, LLC (“Flash Control”) and Defendant Intel Corporation (“Intel”) submit this Joint Claim Construction Statement.

**U.S. Patent No. 8,531,880**

Intel asserts that the ’880 Patent is invalid for lack of written description. Flash Control asserts that the ’880 Patent is valid.

<b>’880 Patent</b>		
<b>Claim Term</b>	<b>Intel’s Proposed Construction</b>	<b>Flash Control’s Proposed Construction</b>
“said system further adapted to write said one or more changes from said second buffer to said volatile memory, <b>thereby updating said one or more updated portions from said volatile memory to said first buffer</b> , thereby updating said page stored therein to include said one or more changes associated with said one or more write request”	Indefinite	Plain and ordinary meaning

**U.S. Patent No. 8,817,537**

Intel asserts that the '537 Patent is invalid for lack of written description. Flash Control asserts that the '537 Patent is valid.

Dated: May 27, 2020

By: /s/ Timothy Devlin

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on May 27, 2020 all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(b)(1).

*/s/ J. Stephen Ravel*

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J. Stephen Ravel